

UNITED STATES DISTRICT COURT for the  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES,

Plaintiff,

NOTICE OF MOTION FOR  
PROBATION MATERIALS

v.

FRANK KNIGHT,

Case no.: 23-cr-099

Defendant.

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\MOTION BY:

Barry J. Donohue, Esq., attorney for defendant  
FRANK KNIGHT.

DATE, TIME & PLACE:

Before the Honorable Jeremiah J. McCarthy, United  
States Magistrate Court Judge, Robert H. Jackson  
United States Courthouse, 2 Niagara Square,  
Buffalo, New York at a date, time and place to be  
set by the Court.

SUPPORTING PAPERS:

NOTICE OF MOTION AND SUPPORTING  
PAPERS OF PETER GERACE JULY 24, 2025  
[507].

RELIEF REQUESTED AND  
GROUNDS FOR RELIEF:

To join the motion of Peter Gerace [507] for an  
Order compelling the United States Probation  
Office to produce: (1) its file for Crystal Quinn for  
*in camera* review for exculpatory or impeachment  
material; and (2) the pretrial services and  
presentence reports for \_\_\_\_\_ and \_\_\_\_\_.

NATURE OF ACTION:

18 U.S.C. §371 (conspiracy to obstruct justice); 18  
U.S.C. §1001(a)(2) ((2) false statements to FBI).

Dated: July 28, 2025  
Erie County, New York

BARRY J. DONOHUE, ESQ.  
Attorney for plaintiff

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